

REMARKS

This Amendment is filed in response to the Office Action dated June 2, 2004 and the Notice of Appeal filed November 2, 2004. This Amendment is filed with a Request for Continued Examination (RCE). This RCE is a request by Applicant to remove the case from appeal in favor of continued examination.

Applicant first notes with appreciation the Examiner's thorough examination of the application as evidenced by the Office Action. In response to the Office Action, Applicant has amended the specification and claims 19, 20, and 22-24 to clear up § 112 issues raised by the Examiner. As currently presented, the patent application now includes Claims 1-26 with Claims 1, 7, 13, 19, 23, and 25 being independent claims. Applicant respectfully submits that the amended claims are patentable over the cited references. Applicant therefore requests that the Examiner reconsider the claims in light of the remarks below.

I. Missing Information Disclosure Statement

In paragraph 4, the Office Action indicates that it did not receive the PTO-1449 form submitted with the information disclosure statement (IDS) filed July 25, 2002. Applicant notes that an IDS was not filed on this date. Instead, a request for publication of the application was filed by Applicant to inform the patent office that the application had been filed foreign, and thus was subject to publication rules. As such, Applicant submits that there is no missing IDS or PTO-1449 form.

II. The Claims and Specification Are Definite

In paragraph 5, the Office Action rejects Claim 19 as indefinite for use of the term "CDNA system." Further, the Office Action states that the terms "CDNA, MDNA, CDNA ID, master DNA (MDNA) index, and customer DNA (CDNA) number" should be spelled out clearly in the specification.

In light of these objections, Applicant has amended the specification and claims. Specifically, Applicant has amended the specification to explain the user of the term "DNA." The specification, as amended, now explains that the term DNA is used to connote a unique

identification for each customer. In this regard, a customer DNA (CDNA) system refers to a system that stores a unique ID for a customer; a master DNA (MDNA) index is an index of unique IDs for customers; and a CDNA ID is a unique ID for a customer.

Further, Applicant has amended Claims 19, 20, and 22-24 to remove the term "DNA" and replace it with the term "information," such as "information system." Applicant respectfully submits that the term "information system" is clearly supported by the specification. Applicant submits that a person reading the specification and claims, as amended, would find them definite.

III. Description of the Invention

The claimed invention provides a master data store. The master data store acts as a cross-reference to a plurality of electronic storage facilities. Specifically, each of the electronic storage facilities includes customer information that has an associated customer ID. Unfortunately, not all of the electronic storage facilities use the same customer ID for each customer. Therefore, one has to know the specific customer ID used for by each electronic storage facility in order to access information on a customer from various electronic storage facilities. In this regard, the master data store includes a unique identifier for each customer. Associated with each unique identifier is a list of the different electronic storage facilities that contain information about the customer and the customer ID used by each electronic storage facility to reference the information. By using the master data store, one can determine all electronic storage facilities that contain information about a customer and the customer ID needed to access the information.

An important feature of the claimed invention is that the master data store is populated and updated "on the fly" through interaction with the plurality of electronic storage facilities. Specifically, when a new customer is added to one of the electronic storage facilities, the electronic storage facility sends the customer's information to the master data store. The system, method, and computer of the claimed invention check the customer information against the data in the master data store. If the customer is not already indexed in the master data store, a unique identifier is assigned to the customer and a data record is inserted in the master data store that includes the unique identifier, the electronic storage facility supplying the customer information, and the identification used by the electronic storage facility to identify the customer. If the

customer is already uniquely identified in the master data store, the system, method, and computer of the present invention create a new record that includes the unique identifier, the electronic storage facility supplying the customer information, and the identification used by the electronic storage facility to identify the customer. In this way, the master data store is populated and updated by the plurality of electronic storage facilities connected thereto as new customer information is received by the electronic storage facilities.

The operation of the claimed invention may be better understood by the following example. Figure 2 of the application illustrates an example master data store for the network illustrated in Figure 1. As illustrated in Figure 2, there is a customer named Sandy L. Smith in the network. See **250**. She has been assigned a unique identity number of "3" in the master data store. As illustrated at **210**, she has information stored in electronic storage facility **120** under customer ID "ACZ20." She also has information stored in electronic storage facility **130** under customer ID "5." If later, Sandy L. Smith is added to electronic storage facility **110** with customer ID Sandra Smith, the following steps take place:

- 1) The system, method, and computer receive identifying information on the customer Sandy L. Smith from the electronic storage facility **110**;
- 2) The system, method, and computer determine whether an identifier exists in the master data store for the customer based on the received identifying information. The electronic storage facility typically sends information such as the customer's name, phone number, social security number, email address, etc., which are used by the system, method, and computer to determine if the customer matches an existing customer profile in the master data store.;
- 3) The system, method, and computer would determine that the new customer information relates to unique ID "3" in the master data store and assign the identifier "3" to the new information.; and
- 4) The system, method, and computer next cross-reference the assigned identifier with the received identifying information. In other words, the system, method, and computer create the following new record in the master data store as shown in the hi-lighted last row:

| CNDA ID | D.S. ID | Customer ID |
|---------|---------|--------------|
| 3 | 120 | ACZ20 |
| 71 | 120 | CBK01 |
| 3 | 130 | 5 |
| 105 | 110 | John Doe |
| 159 | 130 | 10 |
| 235 | 110 | John Doe |
| 71 | 120 | RYT51 |
| 3 | 110 | Sandra Smith |

The patent application includes Claims 1-26 with Claims 1, 7, 13, 19, 23, and 25 being independent claims. Independent Claims 1, 7, and 13 are directed to systems and methods of creating a master data store that cross-references customer information stored in different databases. Claims 19, 23, and 25 are directed to systems and methods that have a plurality of databases all including customer data with different IDs for the same customer and a master data store that includes a unique ID for each customer and a cross-reference to each database containing information on the customer and the ID used by each database for the customer.

IV. The Claims Are Patentable

As currently presented, the patent application includes Claims 1-26 with Claims 1, 7, 13, 19, 23, and 25 being independent claims. Independent Claims 1, 7, and 13 are directed to systems and methods of creating a master data store that cross-references customer information stored in different databases. Specifically, when the systems and methods receive customer information from a particular database, it checks to see if there is already a unique customer ID in the master data store for the customer. If so, it stores under the unique customer ID a reference to the database where the customer data just received is located and the ID used by the database for the customer. Claims 19, 23, and 25 are directed to systems and methods that have a plurality of databases all including customer data with different IDs for the same customer and a master data store that includes a unique ID for each customer and a cross-reference to each database containing information on the customer and the ID used by each database for the customer.

The Office Action rejects all of the claims of the application as obvious in light of U.S. Patent No. 5,826,257 to Snelling, Jr. in combination with U.S. Patent No. 6,029,174 to Sprenger et al. The Office Action alleges that the '257 Snelling patent discloses all aspects of the independent claims except for creating a cross-reference table containing the different identities used for a customer in different databases and a reference to each database. In this regard, the Office Action alleges that this aspect of the claims is disclosed in the '174 Sprenger patent. Applicant respectfully disagrees with these rejections. Applicant respectfully submits that there is no teaching or suggestion for combining the references and even if combined, the combined references do not meet the claims.

Specifically, Applicant submits that in making the combination the Office Action attempted to combine a teaching from the '174 Sprenger patent that is not needed or necessary in the '257 Snelling system. The Office Action argues that the motivation for combining the references is that the discussion in the '174 Sprenger patent concerning cross-referencing of information would be helpful in cross-referencing information in a complex database. This argument misses the point. As discussed in previous amendments, the system of the '257 Snelling patent does not include customer information in different databases. The system of the '257 Snelling patent includes three discrete databases, namely a customer database, an orders database, and an employees database. As all of the data relating to each customer is in one database in the system of the '257 Snelling patent, the system does not need and would not use the cross-referencing techniques described in the '174 Sprenger patent. More importantly, one skilled in the art looking to solve a problem of cross-referencing customer information stored in multiple databases would not be motivated to combine a reference that contains data about a customers only in one database (i.e., '257 Snelling patent) with a reference discussing in general cross-referencing of information (i.e., '174 Sprenger patent).

The Office Action includes some discussion on the '257 Snelling patent concerning the customer table has a customer ID as a primary key and the orders table has a customer ID as a foreign key. (See Office Action page 4). Applicant is confused as to the point of this argument. If the Office Action is attempting to argue that this discloses that customer information is stored in more than one database, then Applicant respectfully disagrees. The '257 Snelling patent

clearly points out that there are three discrete databases and that the customer data is in the customer database and not in the order database or the employee database. While the order database may include a reference to the customer ID associated with the order, the order database does not include information about the customer. In fact the reference to the customer ID in the order database is purposely there to provide a link to the customer information in the customer database. Applicant respectfully submits that there is no way one skilled in the art would determine that an "order database" and/or an "employee database" includes customer information, when the reference clearly discloses a "customer database."

Applicant further submits that even if there was a suggestion to combine the references, that the combination would not meet the claims. Specifically, as discussed above, the system of the '257 Snelling patent includes customer data only in one database. Therefore, in the combination, there would be no cross-referencing of customer information stored in different databases because the system of the '257 Snelling patent only has customer data in one database.

CONCLUSION

In light of the above, Applicant respectfully submits that Claims 1-26 of the patent application are patentable over the cited references. It is therefore respectfully requested that a Notice of Allowance be issued. The Examiner is encouraged to contact Applicant's undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service with sufficient postage as first class mail in an envelope addressed to: Mail Stop RCE, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on April 4, 2005.



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